

ORIGINAL

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

MAR 12 2025

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

ROBERT BIRD,

*Defendant.*

By BONNIE HACKLER  
Clerk, U.S. District Court  
Deputy Clerk

Case No.

25 CR 43 JFH

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**MURDER IN INDIAN COUNTRY – SECOND DEGREE**  
[18 U.S.C. §§ 1111(a), 1151, & 1153]

On or about January 21, 2025, within the Eastern District of Oklahoma, in Indian country, the defendant, **ROBERT BIRD**, an Indian, with malice aforethought, did unlawfully kill Victim, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

COUNT TWO

**USE, CARRY, BRANDISH AND DISCHARGE OF A FIREARM  
DURING AND IN RELATION TO A CRIME OF VIOLENCE**  
[18 U.S.C. §§ 924(c)(1)(A)(i), (ii), & (iii)]

On or about January 21, 2025, in the Eastern District of Oklahoma, the defendant, **ROBERT BIRD**, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence, that is, Murder in Indian Country – Second Degree, as charged in Count One of this Indictment, for which he may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT THREE**

**CAUSING THE DEATH OF A PERSON IN THE COURSE OF A VIOLATION OF  
TITLE 18, UNITED STATES CODE, SECTION 924(c)  
[18 U.S.C. §§ 924(j)(1)]**

On or about January 21, 2025, in the Eastern District of Oklahoma, the defendant, **ROBERT BIRD**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Murder in Indian Country – Second Degree, as charged in Count One of this Indictment and in the course of this violation caused the death of a person through the use of said firearm, which killing is a murder, as defined in Title 18, United States Code, Section 1111(a), in that the defendant, **ROBERT BIRD**, did murder and unlawfully kill Victim with a firearm, in violation of Title 18, United States Code, Section 924(j)(1).

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]**

The allegations contained in Counts One through Three of this Indictment are hereby alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Three of this Indictment involving violations of Title 18, United States Code, Sections 1111(a), 1151, 1153, 924(c)(1)(A)(i), (ii), and (iii), and 924(j)(1), the defendant, **ROBERT BIRD**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- one (1) Beretta, semi-automatic pistol, Model #21A-.22LR, bearing serial number DAA480983; and

- approximately five (5) rounds of Remington branded .22 caliber ammunition.

A TRUE BILL:

CHRISTOPHER J. WILSON  
United States Attorney



MICHAEL E. ROBINSON, MA BAR #693574  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY